

## **REMARKS**

In the final Office Action, the Examiner rejects claims 1, 2, 6-8, 10-15, 19-21, 23-29, 33-35, 37-43, 47-49, 51, and 52 under 35 U.S.C. § 102(e) as being allegedly anticipated by U.S. Patent No. 6,480,860, issued to Monday; rejects claims 3-5, 17, 18, 30-32, and 44-46 under 35 U.S.C. § 103(a) as being allegedly unpatentable over Monday in view of U.S. Patent No. 6,732,360, issued to Seo; and rejects claims 9, 22, 36, and 50 under 35 U.S.C. § 103(a) as being allegedly unpatentable over Monday in view of U.S. Patent No. 5,826,270, issued to Rutkowski. Applicants traverse these rejections for the following reasons.

### **I. 35 U.S.C. § 102(e) Rejections**

The Examiner rejects claims 1, 2, 6-8, 10-15, 19-21, 23-29, 33-35, 37-43, 47-49, 51, and 52 under 35 U.S.C. § 102(e) as being allegedly anticipated by U.S. Patent No. 6,480,860, issued to Monday. Applicants respectfully disagree.

Monday discloses a system for using a markup language, such as XML, to allow a user to access information in a database. Data requests are made from a markup language interface, such as an XML interface, and are then sent through a translator, or bridge, which parses the requests and sends them to an appropriate source (i.e. database) that contains the requested data. The source then retrieves the data and sends it back to the translator, which constructs an XML document with the retrieved data and sends it back to the requesting client. See col. 7, lines 24-67. As such, Monday, however, does not disclose the systems, methods, or computer program product as recited in independent claims 1, 11, 24, 25, 38, 51, and 52.

For example, claim 1 recites, inter alia, "sending, by the requestor application, an information request to a master pivot program, the information request including

document information related to a requested financing document.” Monday only discloses data requests, and fails to disclose financing documents. Therefore, Monday fails to disclose an information request that includes document information related to a requested financing document. As such, Monday does not teach each and every element of claim 1, and thus the rejection of claim 1 should be withdrawn and the claim allowed.

Furthermore, claim 11 recites, *inter alia*, “retrieving, by the master pivot program, dimensions from a configuration database as a function of the XML document” and “retrieving a destination and a MCI command from the configuration database.”

Monday fails to disclose a configuration database, and further fails to disclose retrieving at least dimensions and an MCI command from the database. In the final Office Action, the Examiner contends that the “association file 250” in col. 7, lines 34-35 of Monday is a configuration database, and that the association file contains a document type definition (DTD) that is used to configure the request. See Final OA at 12-13.

Applicants respectfully disagree with the Examiner’s interpretation. First, a database is different from a file, and cannot be reasonably interpreted as such. Therefore, Monday does not disclose a configuration database. Second, Monday also fails to disclose retrieving either “dimensions” or an “MCI command” from the file. Therefore, Monday fails to teach, *inter alia*, retrieving, by the master pivot program, dimensions from a configuration database as a function of the XML document, or retrieving a destination and an MCI command from the configuration database. As such, Monday does not teach each and every element of claim 11, and thus the rejection of claim 11 should be withdrawn and the claim allowed.

Independent claims 24, 38, and 51, although of different scope from claim 11, also recite retrieving “dimensions” and an “MCI command” from a configuration database. Thus for at least the same reasons set forth above with regard to claim 11, the cited art fails to support the rejection of claims 24, 38, and 51. Accordingly, for the same reasons stated with regard to claim 11, claims 24, 38, and 51 should be allowed as well.

The Examiner further rejects claim 25 in view of Monday. However, claim 25 recites, inter alia, “a requestor application for generating an information request, the information request including document information related to a first requested information document that is part of a group of requested documents.” Monday does not disclose a requested information document that is part of a group of requested documents. Instead, Monday only discloses requests for data. As such, Monday does not teach each and every element of claim 25, and thus the rejection of claim 25 should be withdrawn and the claim allowed.

Independent claim 52, although of different scope from claim 25, also recites “a first requested information document that is part of a group of requested documents.” Thus for the same reasons stated with regard to claim 25, claim 52 should be allowed as well.

Dependent claims 2, 6-8, 10, 12-15, 19-21, 23, 26-29, 33-35, 37, 39-43, 47-49, 53, and 54 depend from at least one of claims 1, 11, 25, and 38. As explained, independent claims 1, 11, 25, and 38 are distinguishable from the cited art. Therefore, dependent claims 2, 6-8, 10, 12-15, 19-21, 23, 26-29, 33-35, 37, 39-43, 47-49, 53, and 54 are also distinguishable from the cited art for at least the same reasons set forth

above in connection with independent claims 1, 11, 25, and 38. Thus, the rejection of these claims should be withdrawn and the claims allowed.

## **II. 35 U.S.C. § 103(a) Rejections**

The Examiner rejects claims 3-5, 16-18, 30-32, and 44-46 as being unpatentable over Monday in view of Seo, and rejects claims 9, 22, 36, and 50 as being unpatentable over Monday in view of Rutkowski. However, as discussed above, Monday fails to disclose certain claim features present in the pending independent claims. For example, Monday fails to disclose a requested financing document, as recited in claim 1, a first requested information document that is part of a group of requested documents, as recited in claim 25, and retrieving dimensions and an MCI command from a configuration database, as recited in claim 11. Neither Seo, nor Rutkowski cure these deficiencies. Thus, Applicants respectfully traverse the Section 103(a) rejections, for at least the same reasons described above.

## **III. Conclusion:**

Applicants respectfully request that this Amendment under 37 C.F.R. § 1.116 be entered by the Examiner, placing claims 1-54 in condition for allowance. Applicants respectfully point out that the final action by the Examiner presented some new arguments as to the application of the art against Applicant's invention. It is respectfully submitted that the entering of the Amendment would allow the Applicants to reply to the final rejections and place the application in condition for allowance.

Applicants further submit that the entry of the amendment would place the application in better form for appeal, should the Examiner dispute the patentability of the pending claims.

In view of the foregoing remarks, Applicants submit that this claimed invention, as amended, is neither anticipated nor rendered obvious in view of the prior art references cited against this application. Applicants therefore request the entry of this Amendment, the Examiner's reconsideration and reexamination of the application, and the timely allowance of the pending claims.

The final Office Action contains characterizations of the claims and the related art with which Applicants do not necessarily agree. Unless expressly noted otherwise, Applicants decline to subscribe to any statement or characterization in the Office Action.

If a telephone interview will expedite issuance of this application, the Examiner is requested to call Applicants' representative, whose name and registration number appear below, to discuss any remaining issues.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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